

David C. Groff
Marisa M. Bavand
GROFF MURPHY TRACHTENBERG
& EVERARD, PLLC
300 E. Pine
Seattle, WA 98122
Telephone: (206) 628-9500
Facsimile: (206) 628-9506

The Honorable Robert Whaley

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

THE UNITED STATES OF
AMERICA, For the Use and Benefit
of CONTRACTORS EQUIPMENT
MAINTENANCE COMPANY, INC.,
a Washington corporation,

Plaintiff,

V.

BECHTEL HANFORD, INC., a corporation; P.W. STEPHENS CONTRACTORS, INC., a Missouri corporation; ACSTAR Insurance Company, a foreign corporation,

Defendants.

No. CV-02-5006-RHW
BHI'S MOTION FOR JUDGMENT

Defendant, Bechtel Hanford, Inc. (“BHI”) hereby requests the Court for entry of Judgment against United Coastal Insurance Company (“UCIC”), as surety for the Supersedeas Bond on Appeal filed with the Court on or around June 9, 2004. A summary of the requested Judgment is detailed as follows:

BHI'S MOTION FOR JUDGMENT – Page 1

**GROFF MURPHY
TRACHTENBERG &
EVERARD PLLC**
300 EAST PINE
SEATTLE, WASHINGTON 98122
(206) 628-9500
FACSIMILE: (206) 628-9506

For Undertaking Liability of ACSTAR Insurance Company:	
Principal	\$ 282,611.00
Cost Pursuant to Rule 54(d)	\$16,239.56
Post Judgment Interest at 1.18% or \$9.66 per diem Pursuant to 28 U.S.C. §1961 from March 23, 2004 to March 23, 2006	\$7,052.87
Total as of March 23, 2006	\$305,903.43

For Undertaking Liability of P.W. Stephens Contractors, Inc.:	
Attorney's fees	\$296,554.00
Costs	\$19,604.53
Pre-Judgment Interest	\$95,989.35
Post Judgment Interest at 1.18% or \$13.33 per diem Pursuant to 28 U.S.C. §1961 from March 23, 2004 to March 23, 2006	\$9,727.63
Total as of March 23, 2006	\$421,915.51

In brief, as of March 23, 2006, BHI seeks to recover from UCIC the sum of \$727,818.95, plus thereafter, post judgment interest at \$22.99 per diem.

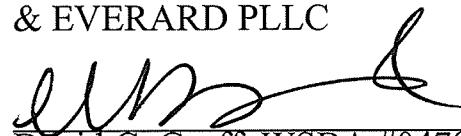
This motion is based on Fed. R. Civ. P. 65.1 and supported by the Declaration of Marisa M. Bavand in Support of Bechtel Hanford, Inc.'s Supplemental Briefing on Attorney's Fees, Cost and Interest, filed on January 30, 2004, and the following pleadings accompanying this motion:

1 1. Memorandum in Support of BHI's Motion for Order Setting Hearing
2 Date and for Judgment,
3 2. Declaration of Marisa M. Bavand, and
4 3. Cost Bill.

5 Dated this 7th day of February, 2006.
6

7 Respectfully submitted,

8 GROFF MURPHY TRACHTENBERG
9 & EVERARD PLLC



10 David C. Groff, WSBA #04706
11 Marisa M. Bavand, WSBA #27929

12 *Attorneys for Defendant Bechtel
13 Hanford, Inc.*